

HEARING DATE AND TIME: May 30, 2013 at 10:00 a.m. (Eastern Time)
RESPONSE DEADLINE: April 25, 2013 at 4:00 p.m. (Eastern Time)

**THIS MOTION SEEKS, *INTER ALIA*, TO DISALLOW AND EXPUNGE
PROOFS OF CLAIM FILED BY LBREP LAKESIDE SC MASTER I, LLC
(CLAIM NOS. 28845 AND 28846).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT LEHMAN BROTHERS
HOLDINGS INC.'S COUNSEL, ARTHUR STEINBERG, AT 212-556-2158**

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
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Arthur Steinberg
Scott Davidson

*Counsel for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF MOTION BY LEHMAN BROTHERS HOLDINGS INC.
AND LEHMAN COMMERCIAL PAPER INC. FOR AN ORDER
(I) DETERMINING THAT THE LCPI SETTLEMENT WAS ENTERED
INTO IN GOOD FAITH PURSUANT TO CALIFORNIA CODE OF
CIVIL PROCEDURE §§ 877 AND 877.6, AND, BASED ON SUCH
GOOD FAITH FINDING AND FOR OTHER REASONS, (II) DISALLOWING
AND EXPUNGING PROOFS OF CLAIM NUMBER 28845 AND 28846**

PLEASE TAKE NOTICE that on March 25, 2013, Lehman Brothers Holdings Inc. (“**LBHI**”) as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* for the entities in the above-referenced chapter 11 cases, including LBHI and Lehman Commercial Paper Inc. (“**LCPI**”), filed its *Motion By Lehman Brothers Holdings Inc. and Lehman Commercial Paper Inc. For An Order (I) Determining That The LCPI Settlement Was Entered Into In Good Faith Pursuant To California Code Of Civil Procedure §§ 877 And 877.6, And, Based On Such Good Faith Finding And For Other Reasons, (II) Disallowing And Expunging Proofs Of Claim Number 28845 And 28846* (“**Motion**”), and that a hearing to consider the Motion will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”), on **May 30, 2013 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New

York, New York 10004, Courtroom 601; (ii) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036, Attn: Arthur Steinberg, Esq., attorneys for LBHI and LCPI; and (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.; so as to be so filed and received by no later than **April 25, 2013 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no objections or responses are timely filed and served with respect to the Motion, LBHI and LCPI may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which Order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: March 25, 2013
New York, New York

/s/ Arthur Steinberg
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